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UNITED STATES BANKRUPTCY COURT

DISTRICT OF OREGON

In re:

PETER SZANTO,

Debtor.

Case No. 16-33185-pcm11

Adv. Proc. No. 16-03114-PCM

DECLARATION OF NICHOLAS J.
HENDERSON REGARDING
DEFENDANTS' PRODUCTION OF
DOCUMENTS

PETER SZANTO,

Plaintiffs,

v.

EVYEE SZANTO, VICTOR SZANTO,
NICOLE SZANTO, KIMBERLEY SZANTO,
MARIETTE SZANTO, ANTHONY
SZANTO, AUSTIN BELL, JOHN BARLOW,
and BARBARA SZANTO ALEXANDER,

Defendants.

Motschenbacher & Blattner, LLP

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I, Nicholas J. Henderson, hereby declare the following under penalty of perjury:

1. I am one of the attorneys for the Defendants in the above captioned case.
2. I am over the age of 18, and I have personal knowledge of the facts stated in this declaration, and would testify to the same if called to do so.
3. I have consulted with each Defendant regarding documents they are required to produce that 1) substantiate attorney's fees they believe are damages caused by Plaintiff, and/or 2) substantiate emotional damages they allege were caused by Plaintiff.
4. Each Defendant asserts that he/she has produced all such documents in their possession, custody or control.

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE
AND CORRECT TO THE BEST OF MY KNOWLEDGE AND BELIEF.

DATED August 18, 2017.

/s/ Nicholas J. Henderson
Nicholas J. Henderson

CERTIFICATE OF SERVICE

I hereby certify that on August 18, 2017, I served the foregoing DECLARATION OF NICHOLAS J. HENDERSON REGARDING PRODUCTION OF DOCUMENTS on the following by mailing first class, postage prepaid:

Peter Szanto
POB 4614
Portland OR 97208

And BY EMAIL TO:

szanto.pete@gmail.com

THE FOLLOWING WERE SERVED ELECTRONICALLY THROUGH ECF/PACER:

- DAVID OLSEN lawofficeofolsen@gmail.com
- US Trustee, Portland USTPRegion18.PL.ECF@usdoj.gov

MOTSCHENBACHER & BLATTNER, LLP

/s/ Christopher Sturgeon

Christopher Sturgeon, Legal Assistant
Motschenbacher & Blattner LLP
Of Attorneys for Defendants